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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CR No. 07-711 MMC
	)	
Plaintiff,	)	STIPULATION AND [PROPOSED]
	)	PROTECTIVE ORDER UNDER FED. R.
v.	)	CRIM. P. 16
	)	
OSCAR E. ROMERO-ROMERO, JR.,	)	
	)	
Defendant.	)	
	)	

On May 21, 2008, the parties in this case appeared before the Court and addressed the need for the following protective order. After that hearing, at which both parties were heard, the Court issues the following Protective Order, to which both parties have stipulated.

**PROTECTED MATERIAL**

The government has provided defense counsel with documents from A-Files related to individuals other than the defendant. Those documents are bates-labeled USA-000419 through USA-000851, and are the "Protected Material." Pending the issuance of this Order, defense

1 counsel agreed to guard the confidentiality of those documents by complying with the terms of a  
2 letter sent by government counsel on May 19, 2008.

3 **PROTECTIVE ORDER**

4 Pursuant to Federal Rule of Criminal Procedure 16, good cause exists for entry of a  
5 protective order for the above-described documents and disclosure of these materials shall be  
6 subject to the following restrictions:

7 **1. Protected Material**

8 Possession of copies of the Protected Material is limited to: (1) attorneys for defendant  
9 Oscar E. Romero-Romero, Jr., specifically Jodi Linker and other attorneys at the Northern  
10 District of California Office of the Federal Public Defender; and (2) their respective  
11 investigators, experts, and paralegals. Those people are collectively referred to as the "Defense  
12 Team."

13 The Defense Team shall not provide copies of the Protected Material to any other person  
14 except the defendant, and only in conjunction with their defense of him in this case. At no time  
15 will any copies of the Protected Material be left in the custody of any person other than the  
16 defendant. The Defense Team is prohibited from using the Protected Material for any purpose  
17 other than defending the defendant in this case. The defendant must return all copies of  
18 Protected Material to the Defense Team after the termination of this case.

19 The Defense Team may show copies of the Protected Material to witnesses or potential  
20 witnesses, but only in conjunction with their defense of the defendant in this case.

21 Further, the defendant's attorneys shall provide the defendant and all members of the  
22 Defense Team with a copy of this Order.

23 This Order shall be binding on all subsequent attorneys who represent the defendant in  
24 this case and on any other person who becomes a member of the Defense Team or comes into  
25 possession of Protected Material.

26 If Protected Material is used in court filings, it shall be filed under seal, and no further  
27 order from the Court is required to file such documents under seal.

28 //

**2. Non-termination**

The provisions of this Order shall not terminate at the conclusion of this prosecution but only upon further order of this Court.

SO STIPULATED:

JOSEPH P. RUSSONIELLO  
United States Attorney

DATED: June 10, 2008

\_\_\_\_\_/s/\_\_\_\_\_  
TAREK J. HELOU  
Assistant United States Attorney

DATED: June 10, 2008

\_\_\_\_\_/s/\_\_\_\_\_  
JODI LINKER  
Attorney for Defendant Oscar Romero-Romero, Jr.

SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE MAXINE M. CHESNEY  
United States District Judge